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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

Maryellen M. Kane Gerald P Kane Debtors : No. 17-14297-ELF

## ANSWER TO MOTION OF DITECH FINANCIAL, LLC. FOR RELIEF FROM THE AUTOMATIC STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. It is admitted that there is a smaller deficiency. The Mortgage has also been sold.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. No response required.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 09/28/18